

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

KRISTOFFER CORNELIUS,

Plaintiff,

vs.

Case No: 2:09-cv-10254  
HON. PAUL D. BORMAN

SHERIFF BOB BEZOTTE,  
COUNTY OF LIVINGSTON, a municipal  
entity and DEPUTY SHERIFF DAVID  
KLEIN, in his individual capacity,

Defendants.

---

**KENNETH D. FINEGOOD, P.L.C.**

By: **KENNETH D. FINEGOOD** (P36170)  
Attorney for Plaintiff  
29566 Northwestern Highway, Suite 120  
Southfield, MI 48034  
(248) 351-0608

**CUMMINGS, McCLOREY, DAVIS & ACHO, P.L.C.**

By: **ANNE McCLOREY McLAUGHLIN** (P40455)  
Attorneys for County of Livingston and  
Sheriff Bob Bezotte, only  
33900 Schoolcraft  
Livonia, MI 48150  
(734) 261-2400

**THOMAS A. MATTHEWS** (P28414)

Attorney for Defendant Deputy Sheriff Klein, only  
2000 Grand River Annex, Suite 200  
Brighton, MI 48114  
(810) 227-7878

---

**DEFENDANTS' JOINT OFFER OF JUDGMENT**

Defendants, SHERIFF BOB BEZOTTE and COUNTY OF LIVINGSTON, through their  
Attorneys, CUMMINGS, McCLOREY, DAVIS & ACHO, P.L.C., and Defendant, DEPUTY

SHERIFF DAVID KLEIN, through his Attorney, THOMAS A. MATTHEWS, jointly offer to stipulate to the entry of judgment in favor of the Plaintiff in the amount of Fifteen Thousand and 00/100 (\$15,000.00) Dollars, inclusive of all damages of any kind, costs, interest and attorney's fees.

s/ ANNE McCLOREY McLAUGHLIN  
CUMMINGS, McCLOREY, DAVIS & ACHO, P.L.C.  
33900 Schoolcraft Rd.  
Livonia, MI 48150-1392  
Phone: (734) 261-2400  
[amclaughlin@cnda-law.com](mailto:amclaughlin@cnda-law.com)  
P40455

/s THOMAS A. MATTHEWS (with consent)  
2000 Grand River Annex, Suite 200  
Brighton, MI 48114  
Phone: (810) 227-7878  
[tmattlaw@aol.com](mailto:tmattlaw@aol.com)  
P28414

### **CERTIFICATE OF SERVICE**

I hereby certify that on **April 6, 2009**, I electronically filed the foregoing paper with the Clerk of the Court using the ECF system which will send notification of such filing to the following:

Kenneth D. Finegood, Esq. and Thomas A. Matthews, Esq.

s/ ANNE McCLOREY McLAUGHLIN  
CUMMINGS, McCLOREY, DAVIS & ACHO, P.L.C.  
33900 Schoolcraft Rd.  
Livonia, MI 48150-1392  
Phone: (734) 261-2400  
[amclaughlin@cnda-law.com](mailto:amclaughlin@cnda-law.com)  
P40455